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September 16, 2022

Via CM/ECF

Honorable Elizabeth A. Pascal, U.S.M.J.
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: *Gary Evangelista, et al. v. The Housing Authority of the City of Camden, et al.*
Case No. 1:20-cv-16824-KMW-EAP

Dear Judge Pascal:

This office represents Defendants, The Housing Authority of the City of Camden, Victor Figueroa, Katheryn Blackshear, and Deborah Person Polk, in the above-captioned matter. Defendants submit this letter setting forth the parties' joint request for a 60-day extension of factual discovery, which is presently set to expire on September 30, 2022. (ECF # 60, ¶ 1)

The parties request this extension for several reasons. First, our office recently received thousands of documents and emails from our client that must be reviewed and produced. Additionally, Plaintiffs still owe Defendants some discovery. For these reasons, Defendants were forced to postpone the depositions of Plaintiffs. The parties are attempting to resolve these issues without Court intervention, but they need additional time to do so. Plaintiffs' counsel, Matthew Moroney, Esq., has consented to the requested extension.

The Court has scheduled a telephone status conference with the parties on Thursday, September 29, 2022 at 12:00 p.m. (ECF # 60, ¶ 6)

We thank the Court for its time and attention to this matter.

Respectfully submitted,

BROWN & CONNERY, LLP

s/ Louis R. Lessig
Louis R. Lessig

LRL/dl

cc: Counsel of Record (via electronic filing only)